

12-17-85

AFFIDAVIT OF GERALD ARMSTRONG

I, Gerald Armstrong, hereby declare under the pains and penalties of perjury as follows:

1. Annexed hereto is a copy of an affidavit and exhibits I submitted in the case of Flynn v. Hubbard, No. 83-2642-Mc, in the United States District Court, District of Massachusetts. I have read the affidavit, affirm its contents, and incorporate it by reference into this affidavit.

2. Throughout 1979 until approximately March of 1980, L. Ron Hubbard lived with a small group of Scientologists in an apartment complex in Hemet, California, about four miles from the Gilman Hotsprings property. Gilman was the relay point for all correspondence and telecommunications to Hubbard. Mail and telexes went to him at least twice daily via a drop in Hemet. I observed the relay of mail to Hubbard and the drop a number of times, and corresponded with Hubbard from Gilman throughout the period. After Hubbard went into deeper hiding in 1980, taking with him Pat and Annie Broeker, communications to him still went via Gilman. It was well known to all of us at my level on Hubbard's personal staff that David Miscavige became at that time the conduit to Hubbard and the Broekers. The Commodore's Messenger Organization International (CMO Int.), Hubbard's personal messengers, who, for him, operated all Scientology

organizations internationally, were based at Gilman. The inner circle of CMO Int., called the Watchdog Committee (WDC), was also at Gilman. David Miscavige was the Chief Officer of CMO Int., and a member of the Watchdog Committee. It is my firm belief that any communication for Hubbard can still get to him from Gilman Hotsprings.

3. Throughout 1979, I participated in a project called "LRH Renovations" which had the job of renovating and furnishing a house and offices for Hubbard on the Gilman property. From about June 1979 through December, I was in charge of LRH Renovations and was also in charge of Hubbard's Household Unit at Gilman. The Household Unit contained Hubbard's steward, cleaner, personal effects in-charge, grounds in-charge, carpenter, electrician, and LRH Renos in-charge. The house prepared for Hubbard was a very nice three-bedroom building. The decor and all the furniture were ordered and approved by Hubbard, as were the decor and furnishings for the offices. The offices were not "monuments" or symbolic offices for Hubbard like some Scientology organizations contain. The Gilman offices were working offices, and contained within them Hubbard's photographic equipment and photo archives and his library of books. Elsewhere on the Gilman property were stored Hubbard's furniture and personal effects not used in the house and offices. It was clearly Hubbard's intention to reside at Gilman Hotsprings. He came there several times throughout 1979, always

in secret however, to avoid service of process. His communications to me and others in his Household Unit indicated he considered Gilman his home and intended to reside there.

Signed under the pains and penalties of perjury under the laws California this 17th day of December, 1985.


GERALD ARMSTRONG

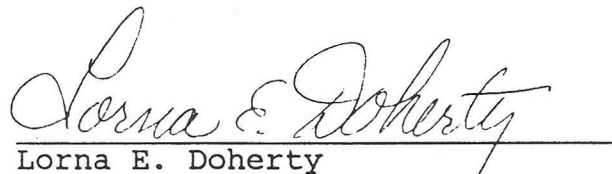
Commonwealth of Massachusetts

Suffolk, ss.

12/17/85

Then personally appeared before me the above named GERALD ARMSTRONG and acknowledged the foregoing instrument to be his free act and deed.

Before me,


Lorna E. Doherty

My Commission Expires 3/31/89